

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE  
WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:	)	
	)	Bankruptcy Case No. 24-21091-GLT
FINISH ROBOTICS, INC.,	)	
Debtor.	)	Chapter 7
	)	
	)	Honorable Gregory L. Taddonio
	)	
	)	Related Document Nos. 57 & 58
CRYSTAL H. THORNTON-ILLAR,	)	
Chapter 7 Trustee of Finish Robotics	)	
Inc.,	)	Hearing Date & Time:
	)	
Movant,	)	
	)	Response Date:
v.	)	
ADVANCED CONSTRUCTION	)	
ROBOTICS, INC.; COMMONWEALTH	)	
OF PA, DEPARTMENT OF LABOR AND	)	
INDUSTRY; JOSEPH LOSINSKI,	)	
AMAZON; ANDREW KUZNESKI, III;	)	
BREX BANK ACCOUNT; CARNEGIE	)	
MELLON UNIVERSITY; COLUMBIA	)	
GAS; COMCAST; DUQUESNE LIGHT	)	
COMPANY; EDWARD ENGLER; FANUC	)	
AMERICA CORPORATION, FI FUND I,	)	
a series of 99 Tartans, LP; FINISH	)	
ROBOTICS, a series of Master Fund 500;	)	
INNOVATION WORKS; LEAD PENCIL,	)	
LLC; LONE OAK TECHNOLOGY, LLC;	)	
MICROSOFT; PITT CREW III, LLC;	)	
PRIMEPAY; QUICKBOOKS; REED	)	
SMITH, LLP; RICKY HOUGHTON;	)	
ROBERT MEYER III; ROBERT MEYER	)	
VI; SEWICKLEY WATER AUTHORITY;	)	
TANGO VC; YIBO XING, MICHAEL	)	
DONOHUE; FI5 Fund I, a series of RollUp	)	
Vehicles, LP; ANDREW KUZNESKI III;	)	
and ZR INVESTMENTS ,	)	
	)	
Respondents.	)	

---

**EXPEDITED MOTION TO ALTER ADVERTISEMENT REQUIREMENTS**

Crystal H. Thornton-Illar, the Chapter 7 Trustee of Finish Robotics, Inc. (the “Trustee” or “Movant”), hereby files this Expedited Motion to Alter Advertising Requirements (the “Motion”) respectfully representing as follows:

**JURISDICTION**

1. The Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2).

2. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

**BACKGROUND**

3. On May 3, 2024 (the “Petition Date”), Finish Robotics, Inc. (the “Debtor”) filed a voluntary petition for relief under Chapter 11 of Title 11 of the United States Code, 11 U.S.C. § 101, *et seq.* (the “Bankruptcy Code”) in the United States Bankruptcy Court for the Western District of Pennsylvania (the “Bankruptcy Court”).

4. On May 6, 2024, Movant was appointed as the Chapter 7 Trustee of Debtor.

5. On May 3, 2025, Trustee filed a Motion for Sale of Substantially All of Debtor’s Assets Free and Clear of Third-Party Interests, Liens, Claims, Charges, and Encumbrances Pursuant to 11 U.S.C. § 363(b) and Approval of Break-Up Fee and Expense Reimbursement [Doc. No. 57] (the “Sale Motion”).

6. Trustee also filed the Notice of Sale [Doc. No. 59] (the “Notice”). The Notice is attached hereto as **Exhibit “A”** (“Notice of Sale”) for advertising purposes.

7. The hearing on the Sale Motion is scheduled for May 29, 2015 at 10:00 a.m. (the “Sale Hearing”) wherein the Bankruptcy Court will consider higher and better offers for the sale of substantially all of Debtor’s assets.

8. On May 6, 2022, counsel for Trustee contacted the Pittsburgh Legal Journal of the Allegheny County Bar Association (the “Legal Journal”) and the Pittsburgh Post-Gazette (“Post-Gazette”) regarding publishing the Notice of Sale as an advertisement in their publications.

9. Counsel for Trustee arranged for the Notice of Sale to run in the May 12, 2025 Law Journal. *See* Proof of Publication of Notice in Pittsburgh Legal Journal attached hereto as **Exhibit “B”**.

10. Counsel for Trustee also arranged for the Notice of Sale to run in the May 8, 2025, Pittsburgh Post-Gazette.

11. When the Trustee did not receive proof of publication from the Pittsburgh Post-Gazette, Counsel for Trustee contacted the Pittsburgh Post-Gazette to inquire about the advertisement, and it was confirmed that the advertisement was not published on May 8, 2025. The Pittsburgh Post-Gazette offered to publish the Notice of Sale on May 18, 2025 for free given that it was not published on the date it was originally supposed to be published. *See* the attached email as **Exhibit “C.”**

#### **RELIEF REQUESTED**

12. Trustee seeks authority to alter the local rules and allow Notice of Sale to be advertised in the Pittsburgh Post-Gazette with less notice than is required under the local rules.

13. Local Rule 6004-1 requires that

[n]otice of any proposed sale shall be advertised . . . in a newspaper of general circulation in the county in which the property is located and in the Legal Journal of such county if one exists . . . . The publication shall be made no more than thirty (30) nor less than fourteen (14) calendar days before the scheduled date of sale.”

W.PA.LBR 6004-1.

14. Trustee’s counsel contacted the Post-Gazette to run the Notice of Sale on the date the Sale Motion was filed.

15. Trustee was told the Notice of Sale would run on May 8, 2025, which is within required timeframe. Through no fault of the Trustee, the advertisement was not published on that date.

16. The Notice of Sale was published on the Electronic Access to Sales Information on the Bankruptcy Court's website and in the Legal Journal within the required timeframe of Local Rule 6004-1.

17. Further, counsel for Trustee served a copy of the Sale Motion and Notice of Sale by mail on various robotic companies that may be interested in the assets being sold by way of the Sale Motion.

18. Given the timing, Trustee requests that the Bankruptcy Court allow Trustee to publish the Notice of Sale less than fourteen (14) days prior to the Sale Hearing. Specifically, Trustee requests that she be permitted to publish the Notice of Sale within eleven (11) days of the Sale Hearing as that is the earliest the Pittsburgh Post-Gazette could publish the Notice of Sale.

19. The need for an expedited hearing has not been caused by any lack of due diligence on the part of Trustee or Trustee's counsel but has been brought about solely by circumstances beyond their control.

***[This space intentionally left blank]***

WHEREFORE, Trustee respectfully requests this Bankruptcy Court grant the within Motion and approve Trustee advertising the Notice of Sale with the Pittsburgh Post-Gazette on May 18, 2025, less than fourteen day prior to the Sale Hearing.

LEECH TISHMAN FUSCALDO & LAMPL, LLC

Dated: May 16, 2025

By: /s/ Crystal H. Thornton-Illar

Crystal H. Thornton-Illar

PA I.D. No. 93003

525 William Penn Place, 28th Floor

Pittsburgh, Pennsylvania 15219

Telephone: 412.261.1600

Facsimile: 412.227.5551

Email: [cthorton-illar@leechtishman.com](mailto:cthorton-illar@leechtishman.com)

*Chapter 7 Trustee of Finish Robotics, Inc.*